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MOLLY PIERONI, JOEL ROLLINS, BEN JONES,  
MICHAEL D. FALCON, ERIC J. ROTHFUS and  
WILLIAM D. UNGER

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CAMBRIDGE SILICON RADIO LIMITED

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

CAMBRIDGE SILICON RADIO LIMITED,  
Plaintiff,

v.

JATOTECH VENTURES, L.P., BANDSPEED,  
INC., WILLIAM L. EVERSOLE, WALTER  
THIRION, MOLLY PIERONI, JOEL  
ROLLINS, BEN JONES, MICHAEL D.  
FALCON, ERIC J. ROTHFUS, WILLIAM D.  
UNGER, and DOES 1-100,

Defendants.

No. CV 12-0333-DMR JSW

**JOINT STIPULATION AND  
[PROPOSED] ORDER REGARDING  
TIME TO ANSWER OR OTHERWISE  
MOVE, PAGE LIMITS AND BRIEFING  
SCHEDULE**

WHEREAS Plaintiff filed its Complaint on January 20, 2012;

WHEREAS Defendants JatoTech Ventures, L.P., Bandspeed Inc., William L. Eversole, Walter Thirion, Molly Pieroni, Joel Rollins, Ben Jones, Michael D. Falcon, Eric J. Rothfus, and William D. Unger (the “Defendants”), were served with the Complaint during the February 3, 2012 to February 12, 2012 time period;

WHEREAS each Defendant believes it has valid grounds to move to dismiss or seek other appropriate relief with respect to the Complaint;

WHEREAS counsel for the Defendants and counsel for Plaintiff Cambridge Silicon Radio Limited (“Plaintiff”) have conferred and agree that it would be most efficient for the Court and the parties to have one consolidated set of briefing papers covering each of the Defendants, rather than filing multiple briefs on multiple schedules;

WHEREAS specifically counsel for the Defendants and the Plaintiff propose that, should a motion be filed, the procedure should be for (i) Defendants to submit a single joint motion to dismiss the Complaint and/or to seek other appropriate relief and a consolidated memorandum of points and authorities in support of their joint motion, rather than individual motions and memoranda; (ii) Plaintiff to submit a single opposition to Defendants’ joint motion; and (iii) Defendants to submit a single consolidated reply to Plaintiff’s opposition;

WHEREAS counsel for the parties have conferred regarding the briefing schedule for the Defendants’ joint motion to dismiss the Complaint and have agreed to the schedule set forth below, and respectfully request that the Court approve the schedule;

WHEREAS, pursuant to the Civil Local Rules of the Northern District of California, each Defendant would be permitted to submit a 25 page brief in support of an individual motion to dismiss, for a total of 250 pages, and Plaintiff would be permitted 25 pages in opposition to each individual motion, for a total of 250 pages;

WHEREAS counsel for the parties agree that while this aggregate number of pages is unnecessary for this briefing, the number of the issues presented in the Complaint

warrant forty (40) pages of briefing for Defendants in support of their joint motion and forty (40) pages of briefing for Plaintiff in opposition. The parties further agree that the page limit for Defendants' reply should be twenty (20) pages;

IT IS HEREBY STIPULATED AND AGREED BY AND BETWEEN THE PARTIES HERETO, through their respective counsel, that:

(1) Defendants each waive any challenges to the sufficiency of process or service of process under Federal Rules of Civil Procedure Rule 12(b)(4) and Rule 12(b)(5);

(2) Defendants shall answer or otherwise respond to the Complaint on or before March 28, 2012;

(3) If Defendants elect to move, they shall file their consolidated memorandum of points and authorities in support of their joint motion on or before March 28, 2012, which shall not exceed forty (40) pages of text;

(4) Plaintiff shall file its opposition to Defendants' joint motion on or before April 30, 2012 and shall not exceed forty (40) pages of text; and

(5) Defendants shall file their reply in support of their joint motion on or before May 18, 2012 and shall not exceed twenty (20) pages of text.

Dated: March 2, 2012

Respectfully submitted,

DEWEY & LEBOEUF LLP

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Pieroni, Joel Rollins, Ben Jones, Michael D.  
Falcon, Eric J. Rothfus and William D. Unger

*Pursuant to General Order No. 45 § X.B., the filer attests that concurrence  
in the filing of this document has been obtained from the above signatory.*

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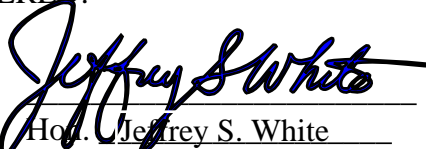
Counsel for Plaintiff  
Cambridge Silicon Radio Limited

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in the filing of this document has been obtained from the above signatory.*

**~~[PROPOSED]~~ ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: March 7, 2012

  
Hon. Jeffrey S. White  
United States District Court